

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION**

**B.P., et al.,**

**Plaintiffs,**

**v.**

**No: 2:23-cv-00071-TRM-JEM**

**CITY OF JOHNSON CITY,  
TENNESSEE, et al.,**

**Defendants.**

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**DECLARATION OF VANESSA BAEHR-JONES**

I, VANESSA BAEHR-JONES, declare under penalty of perjury that the foregoing is true and correct:

1. I am over twenty-one years of age and am competent in all respects to give this Declaration. This Declaration is given freely and voluntarily. I have personal knowledge of the foregoing matter and could, and would, testify competently thereto under penalty of perjury.
2. I am lead counsel for Plaintiffs B.P., et al., in the above-referenced case. I am a licensed attorney in good standing in the State of California (CABN 281715) and admitted to appear *pro hac vice* in this District.
3. Attached hereto as **Exhibit 1** is a true and correct copy of my email to counsel for the Defendant Johnson City, dated June 12, 2024.
4. Attached hereto as **Exhibit 2** is a true and correct copy of an email from counsel for the City, Erick Herrin, to me, dated June 13, 2024.

5. Attached hereto as **Exhibit 3** is a true and correct copy of my email to counsel for the City, dated June 13, 2024.
6. Attached hereto as **Exhibit 4** is a true and correct copy of an email from counsel for the City, Jon Lakey, to me, dated June 13, 2024.
7. Attached hereto as **Exhibit 5** is a true and correct copy of my email to counsel for the City, dated June 13, 2024.
8. Defense counsel never responded to my email attached hereto as Exhibit 5.
9. Attached hereto as **Exhibit 6** is a true and correct copy of the unredacted version of Plaintiffs' June 14, 2024, filing, ECF 221.
10. Attached hereto as **Exhibit 7** is a true and correct copy of my email to counsel for the City, dated June 25, 2024.
11. Defense counsel never responded to my email attached hereto as Exhibit 7.
12. Attached hereto as **Exhibit 8** is a true and correct copy of an email chain between me and counsel for the City, Emily Taylor.
13. Defense counsel never responded to my email, dated June 12, 2024, asking Defendant City to provide the real estate contract between Cathy Ball and Sean Williams document no later than June 18.
14. Attached hereto as **Exhibit 9** is a true and correct copy of my email to counsel for the City, dated June 26, 2024.
15. Attached hereto as **Exhibit 10** is a true and correct copy of my email to counsel for the City, dated June 26, 2024.
16. Defense counsel never responded to my email attached hereto as Exhibit 10.

17. By the end of the day on June 26, 2024, it appeared from internet searches that Ball's press conference had been covered by a number of local media organizations, including Johnson City Press, WJHL, and WCYB.

This is the 28<sup>th</sup> day of June 2024.

/s/ Vanessa Baehr-Jones  
VANESSA BAEHR-JONES

**CERTIFICATE OF SERVICE**

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on June 28, 2024 to counsel of record:

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| <p>K. Erickson Herrin<br/>HERRIN, McPEAK &amp; ASSOCIATES<br/>515 East Unaka Avenue<br/>P. O. Box 629<br/>Johnson City, TN 37605-0629<br/>lisa@hbm-lawfirm.com<br/>sandy@hbm-lawfirm.com</p> <p>Emily C. Taylor<br/>Maria Ashburn<br/>WATSON, ROACH, BATSON &amp;<br/>LAUDERBACK, P.L.C.<br/>P.O. Box 131<br/>Knoxville, TN 37901-0131<br/>etaylor@watsonroach.com<br/>mashburn@watsonroach.com</p> <p><i>Attorneys to Defendants, Johnson City, Tennessee, Karl Turner, in his individual and official capacities, Captain Kevin Peters, in his official capacity, and Investigator Toma Sparks, in his official capacity</i></p> <p>Jonathan P. Lakey<br/>Burch, Porter, &amp; Johnson, PLLC<br/>130 N. Court Ave.<br/>Memphis, TN 38103<br/>901-524-5000<br/>jlakey@bpjlaw.com<br/>mchrisman@bpjlaw.com</p> <p><i>Attorney to Defendant City of Johnson City, Tennessee</i></p> | <p>Daniel H. Rader III<br/>Daniel H. Rader IV<br/>MOORE, RADER &amp; YORK PC<br/>46 N. Jefferson Avenue<br/>P.O. Box 3347<br/>Cookeville, TN 38502-3347<br/>danrader@moorerader.com<br/>danny@moorerader.com<br/>andre@moorerader.com</p> <p><i>Counsel for Kevin Peters in his individual capacity</i></p> <p>Kristin Ellis Berexa<br/>Ben C. Allen<br/>FARRAR BATES BEREXA<br/>12 Cadillac Drive, Suite 480<br/>Brentwood, TN 37027-5366<br/>kberexa@fbb.law<br/>ballen@fbb.law<br/>jdowd@fbb.law<br/>msutton@fbb.law</p> <p><i>Counsel for Toma Sparks in his individual capacity</i></p> <p>Keith H. Grant<br/>Laura Beth Rufolo<br/>Robinson, Smith &amp; Wells, PLLC<br/>633 Chestnut Street, Suite 700<br/>Chattanooga, TN 37450<br/>kgrant@rswlaw.com<br/>lrufolo@rswlaw.com<br/>awells@rswlaw.com</p> <p><i>Counsel for Justin Jenkins in his individual capacity, Jeff Legault in his individual capacity and Brady Higgins in his individual capacity</i></p> |
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/s/ Vanessa Baehr-Jones

Vanessa Baehr-Jones